

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and
GARY AIR AND LAND POLLUTION CONTROL**

**Praxair, Inc.
Clark Road and Dean H. Mitchell Road
Gary, Indiana 46406**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7990-00177	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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Stratospheric Ozone Protection

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) Gary Air and Land Pollution Control. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary industrial gas manufacturing plant.

Responsible Official: Terry Payton
Source Address: Clark Road and Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Phone Number: (716) 879-7029
SIC Code: 2813
County Location: Lake
County Status: Nonattainment for particulate matter 10 microns or less in diameter (PM-10), ozone, and sulfur dioxide (SO₂);
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas fired turbine, identified as A1, constructed in 1965, with a maximum heat input rate of 160 million British thermal units (MMBtu) per hour, exhausting through one (1) stack ID # S001;
- (b) Two (2) natural gas fired boilers, identified as A2 and A3, constructed in 1966, each with a maximum heat input rate of 33 and 67 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S002 and S003, respectively; and
- (c) One (1) natural gas fired Vaporizer Heater, identified as A12, constructed in 1999, with a maximum heat input rate of 41.8 MMBtu per hour, equipped with low NOx burners for nitrogen oxide pollution control, exhausting through two (2) stacks ID #S012A and S012B.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Emergency generators as follows:
 - (1) Diesel generators not exceeding 1600 horsepower:
 - (A) Five (5) diesel fired emergency generators, identified as A6, A7, A8, A10, and A11, each constructed in 1965, 1971, 1975, 1997, and 1999, respectively, each with a maximum heat input rate of 2.8, 3.3, 2.8, 3.2, and 5.2 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S006, S007, S008, S010, and S011.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

(a)	All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM Gary Air and Land Pollution Control.
(b)	Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

- (b) The Permittee shall furnish to IDEM, OAM, Gary Air and Land Pollution Control within a reasonable time, any information that IDEM, OAM, Gary Air and Land Pollution Control may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, Gary Air and Land Pollution Control copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, Gary Air and Land Pollution Control along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, Gary Air and Land Pollution Control on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, Gary Air and Land Pollution Control may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, Gary Air and Land Pollution Control upon request and shall be subject to review and approval by IDEM, OAM, Gary Air and Land Pollution Control.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, Gary Air and Land Pollution Control within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number (Gary Air and Land Pollution Control): 219-853-6306
Facsimile Number (Gary Air and Land Pollution Control): 219-853-6343

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM, Gary Air and Land Pollution Control may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, Gary Air and Land Pollution Control by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, Gary Air and Land Pollution Control shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, Gary Air and Land Pollution Control has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, Gary Air and Land Pollution Control has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, Gary Air and Land Pollution Control determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, Gary Air and Land Pollution Control to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, Gary Air and Land Pollution Control at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, Gary Air and Land Pollution Control may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, Gary Air and Land Pollution Control and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, Gary Air and Land Pollution Control on or before the date it is due.

(2) If IDEM, OAM, Gary Air and Land Pollution Control, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, Gary Air and Land Pollution Control, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, Gary Air and Land Pollution Control, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, Gary Air and Land Pollution Control fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;

- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, Gary Air and Land Pollution Control in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, Gary Air and Land Pollution Control, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, Gary Air and Land Pollution Control or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, Gary Air and Land Pollution Control nor an authorized representative, may disclose the information unless and until IDEM, OAM, Gary Air and Land Pollution Control makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, Gary Air and Land Pollution Control acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM, Gary Air and Land Pollution Control within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, Gary Air and Land Pollution Control, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, Gary Air and Land Pollution Control, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, Gary Air and Land Pollution Control that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, Gary Air and Land Pollution Control that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM Gary Air and Land Pollution Control upon request and shall be subject to review and approval by IDEM, OAM, Gary Air and Land Pollution Control. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, Gary Air and Land Pollution Control on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM Gary Air and Land Pollution Control may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, Gary Air and Land Pollution Control representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Gary Air and Land Pollution Control makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner of Gary Air and Land Pollution Control within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, IN 46402

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, Gary Air and Land Pollution Control on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(**do**) not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) natural gas fired turbine, identified as A1, constructed in 1965, with a maximum heat input rate of 160 million British thermal units (MMBtu) per hour, exhausting through one (1) stack ID # S001;
- (b) Two (2) natural gas fired boilers, identified as A2 and A3, constructed in 1966, each with a maximum heat input rate of 33 and 67 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S002 and S003, respectively;
- (c) Five (5) diesel fired emergency generators, identified as A6, A7, A8, A10, and A11, each constructed in 1965, 1971, 1975, 1997, and 1999, respectively, each with a maximum heat input rate of 2.8, 3.3, 2.8, 3.2, and 5.2 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S006, S007, S008, S010, and S011, respectively; and
- (d) One (1) natural gas fired Vaporizer Heater, identified as A12, constructed in 1999, with a maximum heat input rate of 41.8 MMBtu per hour, equipped with low NO_x burners for nitrogen oxide pollution control, exhausting through two (2) stacks ID #S012A and S012B.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to CP 089-8130-00177, issued on May 21, 1997 and CP 089-10205-00177, issued on February 3, 1999, the input of diesel fuel to the two (2) emergency generators (A10 and A11) and natural gas to the vaporized heater (A12) shall be limited such that the NO_x emissions are limited to less than 25 tons per year.

- (a) The hours of operation of the two (2) emergency generators (A10 and A11) shall be each be limited to 500 hours per twelve (12) consecutive month period. This limitation is equivalent to nitrogen oxide (NO_x) emissions of 9.2 tons per twelve (12) consecutive months. EPA guidance indicates that the potential to emit for an emergency generator may be based on 500 hours of operation per year.
- (b) The input of natural gas to the vaporized heater shall be limited to 38 million cubic feet (MMCF) per twelve (12) consecutive month period. This limitation is equivalent to nitrogen oxide (NO_x) emissions of 1.0 ton per twelve (12) consecutive months.

These limits shall render 326 IAC 2-3 (Emission Offset) rules not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Emission Limitation for Sources of Indirect Heating), the particulate matter emissions from the two (2) boilers (A2 and A3) shall not exceed 0.42 pounds per million Btu input.

D.1.3 Sulfur Dioxide Emission Limitations [326 IAC 7-4-1.1]

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), all fossil fuel-fired combustion sources and facilities located in Lake County and have the potential to emit of sulfur dioxide greater than 25 tons per year shall burn natural gas only.

- (a) The hours of operation of the three (3) emergency generators (A6, A7, and A8) shall be each be limited to 500 hours per twelve (12) consecutive month period. EPA guidance indicates that the potential to emit for an emergency generator may be based on 500 hours of operation per year. This limitation is equivalent to sulfur dioxide (SO₂) emissions of 9.8 tons per twelve (12) consecutive months. Due to these limits, the emergency generators are not subject to the requirements of 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations).

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or Gary Air and Land Pollution Control, compliance with the NO_x limit specified in Condition D.1.1, the PM limit specified in D.1.2, and the SO_x limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) Five (5) emergency generators (A6, A7, A8, A10, and A11) - The Permittee shall maintain monthly records at the source of the following values:
- (1) A log of the hours of operation of each unit including a monthly reading from the unit's operating hours meter, and
 - (2) Amount of diesel fuel used each month.
- (b) Vaporizer Heater (A12) - The Permittee shall maintain monthly records at the source of the following values:
- (1) Amount of natural gas input to the heater.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) The Natural Gas Fired Boiler Certification shall be submitted when submitting monitoring, testing reports/results or other documents as required by this permit to the address listed in Section C - General Reporting Requirements, of this permit, using the certification form located at the end of this permit, or its equivalent.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
GARY AIR AND LAND POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Praxair, Inc.
Source Address: Clark Road & Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Part 70 Permit No.: T089-7990-00177

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

GARY AIR AND LAND POLLUTION CONTROL

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Praxair, Inc.
Source Address: Clark Road & Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Part 70 Permit No.: T089-7990-00177

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
GARY AIR AND LAND POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Praxair, Inc.
Source Address: Clark Road & Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Part 70 Permit No.: T089-7990-00177

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
GARY AIR AND LAND POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Praxair, Inc.
Source Address: Clark Road & Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Part 70 Permit No.: T089-7990-00177
Facility: Five (5) emergency generators (A6, A7, A8, A10, and A11)
Parameter: Operating hours
Limit: Operating hours do not exceed 500 hours per twelve (12) consecutive month period for each facility.

YEAR: _____

Month	Operating hours	Operating hours	Operating hours
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
GARY AIR AND LAND POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Praxair, Inc.
Source Address: Clark Road & Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Part 70 Permit No.: T089-7990-00177
Facility: Vaporizer Heater (A12)
Parameter: Nitrogen Oxides (NOx)
Limit: That the input of natural gas not to exceed 38 million cubic feet (MMCF) per twelve (12) consecutive month period.

YEAR: _____

Month	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
GARY AIR AND LAND POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Praxair, Inc.
Source Address: Clark Road & Dean H. Mitchell Road, Gary, Indiana 46406
Mailing Address: P.O. Box 6188, Gary, Indiana 46406
Part 70 Permit No.: T089-7990-00177

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Praxair, Inc.
Source Location:	Clark Road and Dean H. Mitchell Road, Gary, IN 46406
County:	Lake
SIC Code:	2813
Operation Permit No.:	T089-7990-00177
Permit Reviewer:	Yvette de los Angeles/EVP

On June 10, 1999, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune, Gary, Indiana and The Times, Munster, Indiana, stating that Praxair, Inc. had applied for a Part 70 Operating Permit for the operation of an industrial gas manufacturing plant. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 7, 1999, Praxair, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments and corresponding responses are as follows (changes in bold or strikethrough for emphasis):

Comment 1:

Change Responsible Official to "Plant Manager, currently Terry Payton."

Response 1:

Condition A.1 will be modified as follows:

A.1 General Information ~~[326 IAC 2-7-4(c)]~~ ~~[326 IAC 2-7-5(15)]~~

The Permittee owns and operates a stationary industrial gas manufacturing plant .

Responsible Official: ~~Mike Barsotelli~~ **Terry Payton**

Comment 2:

Remove A.2(c) from the list of emission units. These are the five emergency generators, identified in the permit application and this draft permit as A6, A7, A8, A10, and A11. These are insignificant activities and were listed in the Part 70 application on Form GSD-07 in error. They should have been listed on Form GSD-10.

Definitions in 326 IAC 2-7-1 include:

- (21) "Insignificant activity" has any of the meanings specified in clauses (A) through (G) as follows:
- (G) Any of the following listed activities:
- (xxii) Activities associated with emergencies, including the following:
- (BB) Emergency generators as follows:
- (bb) Diesel generators not exceeding one thousand six hundred (1,600) horsepower.

The largest of these five generators is A11, which has a 5.2 MMBtu/hr input rating. As shown in Table 3.3-1 of AP-42, a diesel engine has 142.2 horse-power per MMBtu of input. Consequently, the largest generator is approximately 740 HP.

These units are for emergency purposes only, except for brief "exercising" periods (on the order of 50 hours per year) as typical for this type of emergency equipment.

Response 2:

Condition A.2 will be modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas fired turbine, identified as A1, constructed in 1965, with a maximum heat input rate of 160 million British thermal units (MMBtu) per hour, exhausting through one (1) stack ID # S001;
- (b) Two (2) natural gas fired boilers, identified as A2 and A3, constructed in 1966, each with a maximum heat input rate of 33 and 67 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S002 and S003, respectively; **and**
- ~~(c) Five (5) diesel fired emergency generators, identified as A6, A7, A8, A10, and A11, each constructed in 1965, 1971, 1975, 1997, and 1999, respectively, each with a maximum heat input rate of 2.8, 3.3, 2.8, 3.2, and 5.2 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S006, S007, S008, S010, and S011, respectively; and~~
- ~~(d)~~**(c)** One (1) natural gas fired Vaporizer Heater, identified as A12, constructed in 1999, with a maximum heat input rate of 41.8 MMBtu per hour, equipped with low NOx burners for nitrogen oxide pollution control, exhausting through two (2) stacks ID #S012A and S012B.

The Facility Description in Section D.1 will be modified as above.

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Please note the following changes under **Insignificant Activities** (Page 2-3 of 8):

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) thaw heater, identified as A5;
 - (2) One (1) regeneration heater, identified as A6;
- (b) Paved and unpaved roads and parking lots with public access; ~~and~~
- (c) Four (4) storage tanks, each with a maximum capacity of 1,050, 1050, 1,000 and 2,000 gallons, respectively, storing diesel oil or fuel oil; ~~and~~
- (d) **Emergency generators as follows:**
 - (1) **Diesel generators not exceeding 1600 horsepower:**
 - (A) **Five (5) diesel fired emergency generators, identified as A6, A7, A8, A10, and A11, each constructed in 1965, 1971, 1975, 1997, and 1999, respectively, each with a maximum heat input rate of 2.8, 3.3, 2.8, 3.2, and 5.2 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S006, S007, S008, S010, and S011.**

Comment 3:

Move the above list of emergency generators to Section A.3 of the permit. It is noteworthy that CP 089-8130-00177 and CP 089-10205-00177 limit the hours of operation for generators A10 and A11 to 500 hours per year. However, since these are emergency generators, EPA guidance (Memorandum from John Seitz, OAQPS, September 6, 1995) indicates that potential to emit may be based on 500 hours of operation. Therefore, it does not appear to be necessary to include this limitation in the part 70 permit since it is based in a potential to emit value.

Response 3:

The emergency generators will be moved to Section A.3 as follows:

- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

~~This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.~~

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) **Emergency generators as follows:**
 - (1) **Diesel generators not exceeding 1600 horsepower:**
 - (A) **Five (5) diesel fired emergency generators, identified as A6, A7, A8, A10, and A11, each constructed in 1965, 1971, 1975, 1997, and 1999, respectively, each with a maximum heat input rate of 2.8, 3.3, 2.8, 3.2, and 5.2 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S006, S007, S008, S010, and S011.**

Comment 4:

Please add the following language to Condition D.1.1(a):

"EPA guidance indicates that the potential to emit for an emergency generator may be based on 500 hours of operation per year."

As previously described, the generators are emergency equipment, with no routine operation (except periodic exercising for maintenance purposes). EPA has recognized that potential to emit for emergency equipment can be based on nominal value of 500 hours per year. Praxair prefers that IDEM include this guidance within the Part 70 permit for purposes of clarification.

Response 4:

Condition D.1.1(a) will be modified as follows:

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to CP 089-8130-00177, issued on May 21, 1997 and CP 089-10205-00177, issued on February 3, 1999, the input of diesel fuel to the two (2) emergency generators (A10 and A11) and natural gas to the vaporized heater (A12) shall be limited such that the NO_x emissions are limited to less than 25 tons per year.

- (a) The hours of operation of the two (2) emergency generators (A10 and A11) shall be each be limited to 500 hours per twelve (12) consecutive month period. This limitation is equivalent to nitrogen oxide (NO_x) emissions of 9.2 tons per twelve (12) consecutive months. **EPA guidance indicates that the potential to emit for an emergency generator may be based on 500 hours of operation per year.**

Comment 5:

Please delete "be" from the beginning of the second line (typo) in Condition D.1.3(a). After the first sentence, please add:

"EPA guidance indicates that the potential to emit for an emergency generator may be based on 500 hours of operation per year."

Response 5:

Condition D.1.3 will be modified as follows:

D.1.3 Sulfur Dioxide Emission Limitations [326 IAC 7-4-1.1]

Pursuant to 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), all fossil fuel-fired combustion sources and facilities located in Lake County and have the potential to emit of sulfur dioxide greater than 25 tons per year shall burn natural gas only.

- (a) The hours of operation of the three (3) emergency generators (A6, A7, and A8) shall be each be limited to 500 hours per twelve (12) consecutive month period. **EPA guidance indicates that the potential to emit for an emergency generator may be based on 500 hours of operation per year.** This limitation is equivalent to sulfur dioxide (SO₂) emissions of 9.8 tons per twelve (12) consecutive months. Due to these limits, the emergency generators are not subject to the requirements of 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations).

Comment 6:

Please delete Condition D.1.6(a) which requires record-keeping of hours of operation for the emergency generators and amount of diesel fuel used each month.

Response 6:

Condition D.1.6(a) cannot be deleted from the permit. It is necessary to record the hours of operation for the emergency generators and the amount of diesel fuel used each month in order to comply with the requirements of Conditions D.1.1 and D.1.3. Therefore, there is no change to the permit due to this comment.

Comment 7:

Please correct "Vaporized" to "Vaporizer" in Condition D.1.6(b).

Response 7:

Condition D.1.6(b) (now Condition D.1.6(a)) will be modified as follows:

D.1.6 Record Keeping Requirements

- (a) ~~Vaporized~~ **Vaporizer** Heater (A12) - The Permittee shall maintain monthly records at the source of the following values:

Comment 8:

Please delete the Quarterly Report form for the five emergency generators. These are insignificant activities with expected emissions to be trivially small and inconsequential, as described above.

Response 8:

The Quarterly Report form cannot be deleted from the permit. The Quarterly Report form will be used to verify that the source is in compliance with Conditions D.1.1 and D.1.3. Therefore, there is no change to the permit due to this comment.

Comment 9:

Condition B.16 - The applicable regulations do not require deviation reporting on any specific schedule. Therefore, we believe 10-day requirement to be unreasonable, especially because deviations must also be reported under Condition C.19, which requires quarterly compliance reports. And even this is unnecessary, because the regulations require them to be submitted only semi-annually.

Response 9:

326 IAC 2-7-5(3)(c)(i) sets out the requirement of reporting required monitoring at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including all the information required in each deviation report. OAM maintains that reporting deviations every six months is not adequate to ensure that the cause of any reoccurring deviation is corrected in a timely fashion. Ten days has been determined to be a reasonable amount of time to report non-

emergency deviations, rather than the shorter reporting times required by the Emergency Provisions. The use of alternate reporting periods is authorized pursuant to 326 IAC 2-7-6(6) (Compliance Requirements) which states "Such other provisions as the commissioner may require", and pursuant to IC 13-14-1-13 which gives the Commissioner authority to establish monitoring and reporting requirements.

In addition, the source should be aware that six months is not the only deviation reporting time period required by 326 IAC 2-7-5(3)(C) (Permit Content). 326 IAC 2-7-5(3)(C)(ii) states "Notwithstanding requirements in this section, the reporting of deviations required by an applicable requirement shall follow the schedule stated in that applicable requirement." 326 IAC 2-7-16(b)(4) (Emergency Provision) requires notification within four (4) daytime business hours after the beginning or discovery of an emergency, and 326 IAC 2-7-16(b)(5) requires the submittal of a faxed or written notice within 2 working days of the time when emission limitations were exceeded due to the emergency.

In the case of Condition C.19, IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAM believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. There may be fact specific cases that would qualify for semi-annual reporting.

There has been no change to these conditions due to this comment.

Comment 10:

Condition D.1.4 - This section required a PMP for the facility and its "control device." The only control device we have is a low-NOx burner for the vaporizer heater, and that is a passive device (flue gas recirculation) that does not require maintenance. Can the PMP requirement be deleted?

Response 10:

In CP 089-10205-00177, issued on February 3, 1999, the source took a voluntary NOx emission limit of 6.0 tons per year from the emergency generator, identified as A11, and the vaporizer heater, identified as A12. This limit was taken so that total NOx emissions from these units would be limited to less than 25 tons per year to avoid the requirements of 326 IAC 2-3 (Emission Offset). Limited potential emissions from the vaporizer heater with the natural gas usage limitation of 38 million cubic feet per year, without the low-NOx burner, would be 2.0 tons per year. When combined with the limited potential NOx emissions from the emergency generator A11, NOx emissions are still limited to less than 25 tons per year. Therefore, since the low-NOx burner on the vaporizer heater is not necessary to limit NOx emissions below 25 tons per year, so that the requirements of 326 IAC 2-3 do not apply, condition D.1.4 requiring a Preventive Maintenance Plan will be removed from section D.1. All subsequent conditions will be re-numbered accordingly.

Comment 11:

Condition D.1.7(b) - The "Natural Gas Certification" form included in the draft permit appears to have as its sole purpose the documentation of alternate fuel usage for the boilers. As stated in our December 1996 Title V permit application, these boilers are natural-gas only, with no alternate fuels. Can the "Natural Gas Certification" form be deleted?

Response 11:

The natural gas certification is used to make sure that OAM is notified if alternative fuel was used. The natural gas certification is also used in lieu of requiring daily visible emissions notations when combusting natural gas. Therefore, the Natural Gas Fired Boiler Certification form cannot be deleted and there has been no change to the permit due to this condition.

**Indiana Department of Environmental Management
Office of Air Management
and
Gary Air and Land Pollution Control**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Praxair, Inc.
Source Location: Clark Road and Dean H. Mitchell Road, Gary, Indiana 46406
County: Lake
SIC Code: 2813
Operation Permit No.: T089-7990-00177
Permit Reviewer: Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Praxair, Inc. relating to the operation of an industrial gas manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas fired turbine, identified as A1, constructed in 1965, with a maximum heat input rate of 160 million British thermal units (MMBtu) per hour, exhausting through one (1) stack ID # S001;
- (b) Two (2) natural gas fired boilers, identified as A2 and A3, constructed in 1966, each with a maximum heat input rate of 33 and 67 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S002 and S003, respectively;
- (c) Five (5) diesel fired emergency generators, identified as A6, A7, A8, A10, and A11, each constructed in 1965, 1971, 1975, 1997, and 1999, respectively, each with a maximum heat input rate of 2.8, 3.3, 2.8, 3.2, and 5.2 MMBtu per hour, respectively, each exhausting through one (1) stack ID # S006, S007, S008, S010, and S011, respectively; and
- (d) One (1) natural gas fired Vaporizer Heater, identified as A12, constructed in 1999, with a maximum heat input rate of 41.8 MMBtu per hour, equipped with low NOx burners for nitrogen oxide pollution control, exhausting through two (2) stacks ID #S012A and S012B.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) thaw heater, identified as A5;

- (2) One (1) regeneration heater, identified as A6;
- (b) Paved and unpaved roads and parking lots with public access; and
- (c) Four (4) storage tanks, each with a maximum capacity of 1,050, 1050, 1,000 and 2,000 gallons, respectively, storing diesel oil or fuel oil.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Operating Permit No. 01961 issued by the City of Gary Air Pollution Control on June 29, 1994;
- (b) Operating Permit No. 01962 issued by the City of Gary Air Pollution Control on June 29, 1994;
- (c) Operating Permit No. 01963 issued by the City of Gary Air Pollution Control on June 29, 1994;
- (d) CP-089-8130-00177, issued on May 21, 1997; and
- (e) CP-089-10205-00177, issued on February 3, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

A notice of completeness letter was mailed to the source on August 12, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (six (6) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 25
CO	greater than 100; less than 250
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	less than 10
Dichlorobenzene	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Toluene	less than 10
Lead	less than 10
Cadium	less than 10
Chromium	less than 10
Manganese	less than 10
Nickel	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year in Lake County and the potential to emit of CO is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.03
SO ₂	0.02
VOC	0.54
CO	38.12
NO _x	76.46
HAP (Lead)	0.00

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
One (1) Gas Turbine Engine (A1)	0.0	0.0	0.0	1.4	119.1	238.3	0.0
Two(2) Boilers (A2 & A3)	3.3	3.3	0.3	2.4	36.8	43.8	0.0
Five (5) Emergency Generators (A6, A7, A8, A10, & A11)	1.3	1.3	1.3	1.6	4.1	19.0	0.0
Vaporized Heater (A12)	0.1	0.1	0.0	0.1	1.6	1.0	0.0
Total Emissions	4.7	4.7	1.6	5.5	161.6	302.1	0.0

- Note:
- The five (5) emergency generators (A6, A7, A8, A10, and A11) are limited to 500 hours per twelve (12) consecutive month period.
 - The input of natural gas to the vaporized heater (A12) shall be limited to 38 million cubic feet (MMCF) per 12 consecutive month period, rolled on a monthly basis.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate nonattainment
SO ₂	moderate nonattainment
NO _x	attainment
Ozone	severe nonattainment
CO*	attainment
Lead	attainment

* Only a portion of Lake County is classified as nonattainment for CO.
The source is located in Gary, Indiana which lies outside of the Lake County CO nonattainment area.

- Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone.

Federal Rule Applicability

- The two (2) natural gas fired boilers (A2 and A3) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart D) because the installation date of the two (2) boilers (A2 and A3) is before the applicability date of August 17, 1971.
- The one (1) natural gas fired turbine (A1) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.330, Subpart GG) because the installation date of the one (1) gas turbine (A1) is before the applicability date of October 3, 1977.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject 326 IAC 2-2 (Prevention of Significant Deterioration). The potential to emit of CO is less than 250 tons per year.

326 IAC 2-3 (Emission Offset)

This source is a NOx major source for 326 IAC 2-3 (Emission Offset).

- (a) The one (1) gas turbine (A1), two (2) boilers (A2 and A3), and the three (3) emergency generators (A6, A7, and A8) were constructed before the applicability date of August 7, 1977. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.
- (b) Pursuant to CP 089-8130-00177, issued on May 21, 1997, the potential to emit of VOC and NOx from the one (1) emergency generator (A10) will be limited to less than 25 tons per year by limiting operating hours to 500 hours per twelve (12) consecutive month period. This limitation is equivalent to nitrogen oxide (NO_x) emissions of 3.5 tons per twelve (12) consecutive months. Therefore, the one (1) emergency generator (A10) is not subject to the requirements of 326 IAC 2-3 (Emission Offset).
- (c) Pursuant to CP 089-10205-00177, issued on February 3, 1999, the potential to emit of VOC and NOx from the one (1) emergency generator (A11) and the vaporized heater (A12) will be limited to less than 25 tons per year.
- (1) The operating hours of the one (1) emergency generator (A11) are limited to 500 hours per twelve (12) consecutive month period. This limitation is equivalent to nitrogen oxide (NOx) emissions of 5.7 tons per twelve (12) consecutive months.
- (2) The input of natural gas to the vaporized heater (A12) shall be limited to 38 million cubic feet (MMCF) per 12 consecutive month period, rolled on a monthly basis. This fuel usage limitation is equivalent to 1.0 ton of NOx emissions per twelve (12) consecutive month period.
- Therefore, the one (1) emergency generator (A11) and the vaporized heater (A12) are not subject to the requirements of 326 IAC 2-3 (Emission Offset).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year for Lake County of VOC and NOx. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen

(15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

The source is not subject to the requirements of 326 IAC 6-1-2, because the potential particulate matter (PM) emissions from the source are less than 100 tons per year and the actual PM emissions from the source are less than 10 tons per year.

326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements)

The source is not listed in 326 IAC 6-1-10(d). Therefore, pursuant to 326 IAC 6-1-10(a), the requirements of 326 IAC 6-1-10 do not apply.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

This source is not subject to the control requirements of 326 IAC 6-1-11.1 because this source does not have the potential to emit of fugitive particulate matter of five (5) tons per year and is not one of the sources listed under 326 IAC 6-1-11.1(a)(2).

326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The particulate matter (PM) emissions from the two (2) boilers (A2 and A3) shall be limited by the following:

The two (2) boilers (A2 and A3), with a combined maximum heat input capacity of 100.0 MMBtu per hour, constructed in 1966, is subject to 326 IAC 6-2-2. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation before June 8, 1972, and located in Lake County shall be limited by the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

$$Pt = \frac{0.87}{(100)^{0.16}} = 0.42 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the two (2) boilers (A2 and A3), based on the above equation, is 0.42 pounds per MMBtu heat input. The two (2) boilers (A2 and A3) have a potential PM emission rate of 0.01 pounds per MMBtu heat input, therefore, they will comply with 326 IAC 6-2-2 (see Appendix A, page 2 of 6, for detailed compliance calculations).

326 IAC 6-3-2 (Process Operations)

This source is not subject to 326 IAC 6-3-2 (Process Operations). This source does not contain any process operations that emit particulate matter emissions.

326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations)

(a) The one (1) gas turbine (A1), two (2) boilers (A2 and A3), and the vaporized heater (A12) are not subject to the 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations) because the potential to emit of sulfur dioxide (SO₂) from each facility is less than 25 tons per year.

(b) The five (5) emergency generators (A6, A7, A8, A10, and A11) are not subject to the 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations). The five (5) emergency generators (A6, A7, A8, A10, and A11) will limit SO₂ emissions to less than 25 tons per year by limiting operating hours to 500 hours per twelve (12) consecutive month period.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties). The total potential to emit VOC from the one (1) gas turbine (A1), two (2) boilers (A2 and A3), five (5) emergency generators (A6, A7, A8, A10, and A11), and the vaporized heater (A12) at the source is limited to less than 25 tons per year. Therefore, the source is not subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties).

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

This source is not subject to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits).

- (a) The one (1) gas turbine (A1), and the two (2) emergency generators (A6 and A7) were constructed before the applicability date of March 21, 1972.
- (b) The three (3) emergency generators (A8, A10, and A11) and the vaporized heater (A12) are not petroleum refining, ferrous metal smelters or refuse incinerator and burning equipment.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) natural gas fired turbine (A1), two (2) natural gas fired boilers (A2 and A3), five (5) diesel fired emergency generators (A6, A7, A8, A10, and A11), and one (1) natural gas fired vaporizer heater (A12) do not have applicable compliance monitoring conditions.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this industrial gas manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T089-7990-00177.**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Vaporizer Heater

Page 5 of 6 TSD App A

Company Name: Praxair, Inc.
Address City IN Zip: Clark Road & Dean H. Mitchell Road, Gary, IN 46406
CP: 089-7990
Plt ID: 089-00177
Reviewer: Yvette de los Angeles/EVP
Date: 11/15/99

POTENTIAL EMISSIONS

Heat Input Capacity
MMBtu/hr

41.8

Potential Throughput
MMCF/yr

366.2

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	50.0	5.5	84.0
				*see below		
Potential Emission in tons/yr	1.4	1.4	0.1	9.2	1.0	15.4

LIMITED POTENTIAL TO EMIT (based on CP-089-10205-00177, issued on February 3, 1999)

Heat Input Capacity
MMBtu/hr

4.3

Potential Throughput
MMCF/yr

38.0

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	50.0	5.5	84.0
				*see below		
Potential Emission in tons/yr	0.1	0.1	0.0	1.0	0.1	1.6

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Vaporizer Heater
HAPs Emissions

Page 6 of 6 TSD App A

Company Name: Praxair, Inc.
Address City IN Zip: Clark Road & Dean H. Mitchell Road, Gary, IN 46406
CP: 089-7990
Plt ID: 089-00177
Reviewer: Yvette de los Angeles/EVP
Date: 11/15/99

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.0	0.0	0.0	0.3	0.0

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Five (5) Emergency Generators (>250 and <600 HP)**

Page 4 of 6 TSD App A

Company Name: Praxair, Inc. **CP#:** 089-7990
City, Indiana: Clark Road & Dean H. Mitchell Road, Gary, IN 46508 **Plt ID:** 089-00177
Reviewer: Yvette de los Angeles/EVP
Date: 11/15/99

Potential Emissions calculated based on 8760 hours per year.

Heat Input Capacity
MM Btu/hr

17.3

Emission Factor in lb/MMBtu	Pollutant					
	PM 0.31	PM10 0.31	SO2 0.29	NOx 4.41	VOC 0.4	CO 0.95
Potential Emission in tons/yr	23.4	23.4	21.9	333.2	27.2	71.8

Actual Emissions calculated based on 500 hours per year.

Heat Input Capacity
MM Btu/hr

17.3

Emission Factor in lb/MMBtu	Pollutant					
	PM 0.31	PM10 0.31	SO2 0.29	NOx 4.41	VOC 0.4	CO 0.95
Potential Emission in tons/yr	1.3	1.3	1.3	19.0	1.6	4.1

Methodology

Emission Factors are from AP42 (Fifth edition, January 1995), Table 3.3-2

Potential Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Actual Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Two (2) Small Industrial Boilers

Company Name: Praxair, Inc.
Address City IN Zip: Clark Road & Dean H. Mitchell Road, Gary, IN 46406
CP: 089-7990
Plt ID: 089-00177
Reviewer: Yvette de los Angeles/EVP
Date: 11/15/99

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

100.0

876.0

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				*see below		
Potential Emission in tons/yr	3.3	3.3	0.3	43.8	2.4	36.8

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

Compliance with 326 IAC 6-2-2 (Particulate Emissions for Sources of Indirect Heating)

Two (2) Boilers (ID # A2 and A3)

The following calculation demonstrates compliance with the allowable PM emission limit of 0.42 lb/MMBtu pursuant to 326 IAC 6-2-2:

maximum heat input capacity	100.00	MM Btu per hour	
PM emissions	0.01	pound per MM Btu	WILL COMPLY

Methodology

PM emissions = [(PM emission from natural gas boiler) * 2000 lb/ton] / [8760 hours * maximum heat input capacity]

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Two (2) Small Industrial Boilers

Company Name: Praxair, Inc.
Address City IN Zip: Clark Road & Dean H. Mitchell Road, Gary, IN 46406
CP: 089-7990
Plt ID: 089-00177
Reviewer: Yvette de los Angeles/EVP
Date: 11/15/99

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.0	0.0	0.0	0.8	0.0

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Gas Turbine Engines

Company Name: Praxair, Inc.
Address City IN Zip: Clark Road & Dean H. Mitchell Road, Gary, IN 46406
CP: 089-7990
Plt ID: 089-00177
Reviewer: Yvette de los Angeles/EVP
Date: 11/15/99

Heat Input Capacity
MMBtu/hr

160.0

	Pollutant					
	PM	PM10	SO2	NOx	* VOC	CO
Emission Factor in lb/MMBtu	NA	NA	NA	0.34	0.002	0.17
Potential Emission in tons/yr	NA	NA	NA	238.3	1.4	119.1

Methodology

* TNMOC (Total Nonmethane Organic Compound) emission factors are used for VOC.

Emission Factors are from AP 42, Chapter 3.2, Table 3.2-1, SCC #2-02-002-01

Emission (tons/yr) = Throughput (MMBtu/hr) x Emission Factor (lb/MMBtu) x (8760 hr/yr)/(2,000 lb/ton)